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February 4, 2019

VIA ECFS

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Protocall, LLC
Section 214 Application for the Discontinuance of Telecommunications Service

Dear Ms. Dortch,

On behalf of Protocall, LLC. ("Protocall" or the "Company") and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Section 63.71 of the Federal Communications Commission's rules, 47 C.F.R. § 63.71, attached please find the Company's Section 214 Application for the discontinuance of domestic telecommunications service.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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Counsel for Protocall, LLC

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

_____)
In the Matter of)
)
Protocall, LLC)
)
Section 214 of the Communications Act of 1934,)
as amended, and Section 63.71 of the)
Commission's Rules, Application for)
the Discontinuance of Telecommunications Service)
_____)

SECTION 214 APPLICATION

Protocall, LLC ("Protocall," the "Company," or the "Applicant") hereby seeks authorization pursuant to Section 214 of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 214, and Section 63.71 of the Commission's Rules, 47 C.F.R. § 63.71, to discontinue its provision of telecommunications service in all states, U.S. possessions and territories in which it is approved to provide service.

Effective October 1, 2017, the assets and customers of Protocall were sold to Combined Public Communications, LLC ("Combined Public") pursuant to an asset purchase agreement (the "Transaction") dated September 27, 2017 by and between Protocall and Combined Public (the "Agreement"). The Transaction was a customer and asset acquisition under which Combined Public acquired the existing customers and substantially all the assets of Protocall currently utilized to provide inmate telecommunications services.

Protocall was a Kansas limited liability company with principal offices located at 14927 S. Caenen Lane, Olathe, Kansas 66062. As a result of the Transaction Protocall filed a Business Entity Amendment to Cancel with the Kansas Secretary of State effective as of October 20,

2017.

Protocall has authority to provide interstate and international telecommunication services¹. Protocall provided inmate telephone services to correctional facilities located in Kansas, Colorado, Iowa, Missouri and Nebraska.

Customers continue to be serviced by Combined Public on substantially the same terms and conditions as previously provided by Protocall. The consummation of the Transaction did not result in an interruption, reduction, loss or impairment of services to any customer. The Transaction did not result in a reduction or impairment of service to Protocall's customers. Combined Public continues to provide a high level of technical operations and customer service to Protocall's customers.

The Transaction raises no competitive issues. Combined Public continues to compete with other local providers of inmate telecommunication services. No radio licenses were included in the Transaction. No foreign carrier affiliations resulted from this Transaction, and consumers were not harmed.

In support of this Application, Applicant provides the following information pursuant to Section 63.71 of the Commission's Rules:

1. Name and Address of Carrier: Applicant's name and address is Protocall, LLC, 14927 S. Caenen Lane, Olathe, Kansas 66062.
2. Date of Planned Service Discontinuance, Reduction or Impairment: The Transaction was effective October 1, 2017. There was no discontinuance, reduction or impairment of service as a result of the Transaction.

¹ File No. ITC-214-20100113-00018 granting authority to provide facilities-based and resale services granted February 12, 2010.

3. Points of Geographic Areas of Service Affected: Protocall is seeking to discontinue the provision of telecommunications service in all states in which is it approved to provide services. Protocall had customers in five states; Kansas, Colorado, Iowa, Missouri and Nebraska.

4. Brief Description of Type of Service Affected: The services affected by the proposed discontinuance consist of all inmate telecommunications services provided by Protocall.

5. Brief Description of the Date and Methods of Notice to All Affected Customers:
Protocall notified all customers via email and telephone regarding the Transaction. Protocall has worked with Combined Public to transition customers and to ensure that the transition was smooth and that there was no interruption in service.

6. Whether the Carrier is Considered Dominant or Non-Dominant with Respect to the Service to Be Discontinued, Reduced or Impaired: Protocall is considered non-dominant with respect to the affected services.

In accordance with Section 214 of the Act, and Section 63.71 of the Commission's Rules and concurrent with this filing, a copy of this Application is being mailed to (1) the Governors and Public Service Commissions (or equivalent) of Kansas, Colorado, Iowa, Missouri and Nebraska and (2) to the Special Assistant for Telecommunications for the Secretary of Defense.

Additional questions regarding this application should be addressed to the undersigned.

Respectfully submitted,

/s/ Lance J.M. Steinhart

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Counsel for Protocall, LLC

Dated: February 4, 2019

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing Section 214 Application for the Discontinuance of Telecommunications Service were served this 4th day of February 2019 upon the following persons, at the addresses listed below, by U.S. mail, postage prepaid, or as otherwise noted:

Secretary of Defense
Attn: Special Assistant for Telecommunications
100 Defense Pentagon
Washington, D.C. 20301

John W. Hickenlooper
Office of the Governor
136 State Capitol Bldg
Denver, CO 80203

Colorado Public Utilities Commission
1560 Broadway
Suite 250
Denver, CO 80202

Kim Reynolds
Office of the Governor
State Capitol
1007 East Grand Avenue
Des Moines, IA 50319

Iowa Utilities Board
1375 E. Court Avenue
Des Moines, IA 50319-0069

Jeff Colyer, M.D.
Office of the Governor
Capitol, 300 SW 10th Avenue
Suite 214S
Topeka, KS 66612-1590

Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Michael L. Parson
Office of the Governor
POB 720
Jefferson City, MO 65102

Missouri Public Service Commission
200 Madison Street, POB 360
Jefferson City, MO 65102-0360

Pete Ricketts
Office of the Governor
Lincoln Office/State Capitol
POB 94848
Lincoln, NE 68509-4848

Nebraska Public Service Commission
1200 N Street, Suite 300
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